

MARGARET A. MCLEATCHIE, Nevada Bar No. 10931  
LEO S. WOLPERT, Nevada Bar No. 12658  
**MCLEATCHIE LAW**  
602 South Tenth Street  
Las Vegas, NV 89101  
Telephone: (702) 728-5300  
Fax: (702) 425-8220  
Email: efile@nvlitigation.com  
*Counsel for Plaintiff Jessica Halverson*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JESSICA HALVERSON, an individual,

Plaintiff,

vs.

MISSION SUPPORT AND TEST  
SERVICES, LLC, a Delaware limited-  
liability company.

Defendants.

**Case No.:** 2:24-cv-00201-RFB-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY PLAN AND  
SCHEDULING ORDER**

**(SECOND REQUEST)**

**I. STATUS OF DISCOVERY.**

**A. PLAINTIFF'S DISCOVERY**

1. Plaintiff's Initial Disclosures, dated April 9, 2024.

**B. DEFENDANTS' DISCOVERY**

1. Defendants' Initial Disclosures, dated April 9, 2024.
2. Defendants' First Set of Requests for Admission, dated May 31, 2024.
3. Defendants' First Set of Requests for Production, dated May 31, 2024.
4. Defendants' First Set of Interrogatories, dated May 31, 2024

**II. DISCOVERY THAT REMAINS TO BE COMPLETED.**

Exchange of written discovery, initial expert disclosures, and depositions.

///

///

///

### III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY

This is the second request for an extension of discovery deadlines in this matter. The Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional sixty (60) days so that the Parties may complete the tasks above.

The Parties have been diligently conducting discovery, but an extension is needed to efficiently continue to conduct discovery, resolve issues or pursue meet and confer efforts, analyze the information provided, and manage the case. The Parties are resolving issues and meeting and conferring regarding related issues. Finally, the Parties together request this in good faith and to further the resolution of this complicated case on the merits, and not for any purpose of delay.

Good cause for this extension particularly exists with regard to amending the pleadings and adding parties, as further discovery (and an ENE session) needs to be completed before current deadline of August 5, 2024, to determine whether amendment will be needed.

Good cause for the extension also exists due to Plaintiff's counsel experiencing family medical emergencies, as noted in the first request for an extension of the instant deadlines (ECF No. 17.) Following the recent death of Mr. Wolpert's father in late May of 2024, Mr. Wolpert has had extensive family obligations as has Ms. McLetchie. Then, on July 28, 2024, Ms. McLetchie's mother passed away, requiring her to assist with funeral arrangements and attend to her late mother's affairs and estate. The death has impeded Ms. McLetchie's ability to perform legal work on this and other matters.

There is thus good cause for the extension. "Good cause to extend a discovery deadline exists 'if it cannot reasonably be met despite the diligence of the party seeking the extension.'" *Derosa v. Blood Sys., Inc.*, No. 2:13-cv-0137-JCM-NJK, 2013 U.S. Dist. LEXIS 108235, 2013 WL 3975764, at 1 (D. Nev. Aug. 1, 2013) (quoting *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)); *see also* Fed. R. Civ. P. 1 (providing that the Rules of Civil Procedure "should be construed, administered, and employed by the court and the Parties to secure the just, speedy, and inexpensive determination of every action

and proceeding”). The Parties have been diligent in litigating this matter. Thus, the standard to extend all deadlines is satisfied here.

Based on the foregoing stipulation and proposed deadlines plan, the Parties thus respectfully request an extension of time to extend the discovery in this matter to enable to them to conduct necessary discovery in this matter and so that this matter is fairly resolved on the merits.

#### IV. PROPOSED SCHEDULE FOR REMAINING DEADLINES.

Deadline	Current Deadline (ECF No. 12)	Proposed New Deadline
Amend Pleadings and Add Parties	August 5, 2024	October 4, 2024
Initial Expert Disclosures	September 2, 2024	November 1, 2024
Rebuttal Expert Disclosures	October 1, 2024	December 2, 2024 <sup>1</sup>
Discovery Cut-Off	November 1, 2024	December 31, 2024
Dispositive Motions	December 2, 2024	January 31, 2025
Joint Pretrial Order <sup>2</sup>	December 31, 2024	March 3, 2025 <sup>3</sup>

Based on the foregoing stipulation and proposed deadlines plan, the Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional sixty (60) days so that the parties may conduct necessary discovery.

///

///

///

///

///

///

///

<sup>1</sup> 60 days from October 1, 2024 is Saturday, November 30, 2024.

<sup>2</sup> If a dispositive motion is filed, the Joint Pretrial Order will be filed 30 days after the decision on the dispositive motion.

<sup>3</sup> 60 days from December 31, 2024 is Saturday, March 1, 2025.

1 **IT IS SO STIPULATED.**

2  
3  
4 DATED this 5<sup>th</sup> day of August, 2024.

5 **MCLETSCHIE LAW**

6  
7 By: /s/ Leo S. Wolpert  
8 MARGARET A. MCLETSCHIE  
9 Nevada Bar No. 10931  
10 LEO S. WOLPERT,  
11 Nevada Bar No. 12658  
12 602 South Tenth Street  
13 Las Vegas, Nevada 89101  
14 Telephone: (702) 728-5300  
15 Fax: (702) 425-8220  
16 efile@nvlitigation.com  
17 *Attorneys for Plaintiff*

DATED this 5<sup>th</sup> day of August, 2024.

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

By: /s/ Sheri M. Thome  
SHERI M. THOME, ESQ.  
Nevada Bar No. 8657  
JAMES V. LOVETT, ESQ.  
Nevada Bar No. 16103  
6689 Las Vegas Blvd. South, Suite  
200  
Las Vegas, Nevada 89119  
Telephone: 702.727.1400  
Fax: 702.727.1401  
Sheri.Thome@wilsonelser.com  
*Attorney for Defendant*

**ORDER**

**IT IS SO ORDERED.**



U.S. DISTRICT COURT MAGISTRATE JUDGE

**DATED: 8/6/2024**